

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

JACK HILLER,

Defendant.

Case No. 3:18-MJ-475 (TWD)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about February 2018 in the county of Broome in the Northern District of New York the defendant violated:

*Code Section*  
18 U.S.C. § 2252A(a)(2)(A)

*Offense Description*  
Receipt of Child Pornography

This criminal complaint is based on these facts:  
See attached affidavit


☒ Continued on the attached sheet.

ATTESTED TO BY THE APPLICANT IN  
ACCORDANCE WITH THE REQUIREMENTS OF  
RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL  
PROCEDURE

Sworn to before me and signed in my presence.

Date: 8/21/18

City and State: Syracuse, NY

  
Complainant's signature  
Jenelle Corrine Bringuel, Special Agent

Printed name and title

  
Judge's signature

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Jenelle Bringuel, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since June 2012 and am currently assigned to the Albany Division, Binghamton Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to cyber crimes and crimes against children. I am currently investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience regarding such crimes through training in seminars, classes, and everyday work related to conducting these types of investigations.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18 United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). As an FBI Special Agent, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors, specifically those involving the possession, receipt and distribution of child pornography in violation of Title 18, United States Code, Section 2252A.

3. I make this affidavit in support of a criminal complaint and arrest warrant charging JACK G. HILLER JR with knowingly receiving child pornography using a means and facility of interstate and foreign commerce, and in and affecting such commerce, in violation of Title 18 United States Code §§ 2252A(a)(2)(A), (b)(1) and 2256(8)(A) (receipt of child pornography).

4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my experience and training as a Special Agent of the FBI. As this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me

concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that JACK G. HILLER JR has violated Title 18, United States Code, §§ 2252A(a)(2)(A), (b)(1) and 2256(8)(A) (receipt of child pornography).

**Details of the Investigation**

5. On February 20, 2018 the FBI Washington Field Office (WFO) was alerted by the FBI Detroit Division that a subject, M.M., while using the “Kik” app under the username of “MGMFREEDOM,” exchanged child pornography images with multiple Kik app users, to include a subject, B.K., of Marysville, Michigan. On February 21, 2018, M.M. was interviewed by FBI WFO and admitted to taking pornographic images of his 8-year-old step-daughter and sending them to other users on the Kik app. Forensic analysis of M.M’s devices determined that M.M. exchanged child pornography images and/or videos with Kik user, “jumpinjack72,” from January 27, 2018 to February 26, 2018.

6. On May 22, 2018, TFO Kresge viewed the Kik chats and images exchanged between “mgmfreedom” and “jumpinjack72.” Conversations between “mgmfreedom” and “jumpinjack72” start on February 2, 2018, in which “jumpinjack72” states that he lost stuff and “mgmfreedom” asks him what he likes. The Kik user “jumpinjack72” advises that he likes teens, bi, and bbw as well as young. A review of the Kik messages between “mgmfreedom” and “jumpinjack72” showed “mgmfreedom” distributed numerous images of child pornography to “jumpinjack72” including three images of nude females between the ages of 5 and 10 years old who were tied up and bound by the hands and feet, three of which are described as follows:

a. On February 2, 2018 at 9:59 PM, “mgmfreedom” sent “jumpinjack72” a file named “4c39a62a-d689-4e81-ad08-ff1fdb0bfe8a” which contains a teen female orally licking the naked genitals of a pre-pubescent female approximately 6-10 years in age.

b. On February 3, 2018 at 9:17 AM, “mgmfreedom” sent “jumpinjack72” a file named “d906e9a5-3a4b-408e-ab10-99ffa7ec7951.jpg” which depicts an adult male standing and having vaginal sexual intercourse with nude female approximately 6 10 years in age who is laying on her back.

c. On February 3, 2018 at 9:31 AM, “mgmfreedom” sent “jumpinjack72” a file named “dd1c9eec-37b9-4c6a-8a6a-e528babea8e3.jpg” which depicts a nude male approximately 6-10 years old kneeling in front of a standing adult male and the adult male’s penis in the 6-10 year old male’s mouth.

7. The Kik user “jumpinjack72” is associated with e-mail address of wagnfoxis@yahoo.com, a mobile telephone number of 607-760-9160, and several login IP addresses: 50.108.196.118, 172.79.144.241, and 50.108.194.14, which are associated with Jack and Larissa Hiller of 68 Quinn Hill Road, Port Crane, NY 13833:

a. On February 26, 2018, an administrative subpoena was issued to and served on Kik requesting subscriber identification information and IP access logs associated with the “jumpinjack72” account. Kik responded to the subpoena and provided a display name of “Jumpin Jack”, and an e-mail of wagnfoxisl@yahoo.com for the username “jumpinjack72.” Kik also provided IP logs from January 27, 2018 to February 26, 2018, that showed several Frontier Communications IP addresses (50.108.196.118, 172.79.144.241, and 50.108.194.14) regularly being used to access the “jumpinjack72” account during this time period.

b. On February 26, 2018, an administrative subpoena was issued to and served on Frontier Communications requesting the subscriber name, address of service, and billing information associated with IP addresses 50.108.196.118 on 01/27/18

at 14:45:13 UTC and 172.79.144.241 on 01/29/18 at 17:24:53 UTC, which were the first times those IP addresses appeared in the administrative subpoena results received from Kik, and 50.108.194.14 on 02/26/18 at 09:26:53 UTC, which was the most recent login to the Kik account at the time the information was received by your Affiant from FBI WFO. Frontier responded that on those dates and times each of the IP addresses were assigned to the account at 68 Quinn Hill Road, Port Crane, NY 13833, under the customer name Larissa Hiller, with an associated e mail address of jacnris1992@frontier.com. Service to that subscriber at that location was activated on 11/09/2009.

c. An administrative subpoena was issued to and served on Yahoo! Requesting subscriber identification information for the e-mail address of wagnfoxisl@yahoo.com. Yahoo! responded with a subscriber name of Jack Ris, created on 04/28/2015, with a telephone number of 607-760-9XXX.

d. An administrative subpoena was issued to and served on Verizon Wireless requesting subscriber identification information for the mobile telephone number of 607-760-9XXX. Verizon Wireless responded with a subscriber name of Jack and Larissa Hiller, an address of 68 Quinn Hill Road, Port Crane, NY 13833, and an e-mail address of jacnris1992@frontier.com.

8. On August 21, 2018, your Affiant, along with other FBI agents, FBI Task Force officers, and the New York State Police executed a federal search warrant at 68 Quinn Hill Road, Port Crane, NY 13833. Your Affiant and FBI TFO Josh Kresge met defendant HILLER at his residence on that date and HILLER voluntarily agreed to accompany your Affiant and TFO Kresge to the FBI's Binghamton Resident Agency interview room, located in Binghamton, NY to be interviewed.

9. During the interview, which was audio recorded, HILLER was read his Miranda rights, which he acknowledged he understood. HILLER advised he wished to waive his rights and continue to speak to your Affiant and TFO Kresge. In this interview, HILLER admitted to creating and utilizing the Kik account “jumpinjack72” to receive files of child pornography from other Kik users. Specifically, HILLER was shown the images provided to your Affiant from FBI WFO which had been sent to the “jumpinjack72” Kik account. HILLER reviewed the images and stated that he recognized two of the images depicting child pornography as ones he had previously received via his chats on his Kik account. These images are described as follows:

- a. On February 3, 2018 “mgmfreedom” sent “jumpinjack72” a file named “7bfeb81def3037330860aa0a7563132d.jpg” which is an image depicting a nude female, approximately 6 years old, being vaginally penetrated by an adult male penis while the adult male is forcing her legs open. HILLER initialed and dated this image, which is available for the court’s review upon request.
- b. On February 3, 2018 “mgmfreedom” sent “jumpinjack72” a file named “70a3ff0136762edbd6321f7312fa9576.jpg” which is an image depicting a female with her eyes blacked out performing oral sex on the vagina of a nude female, approximately 6 years old. HILLER initialed and date this image, which is available for the court’s review upon request.

10. During the interview, HILLER admitted to utilizing an iPad at his residence to engage in communications with other users on Kik and Adult Friend Finder to discuss taboo sexual interests and exchange child pornography. HILLER admitted he had saved a few images of child pornography that he had received from other individuals via Kik and had distributed them to other Kik users. He stated that he would do this either by saving the image to his iPad or by copying and pasting the image into a different Kik chat to distribute later. HILLER admits he has sexual

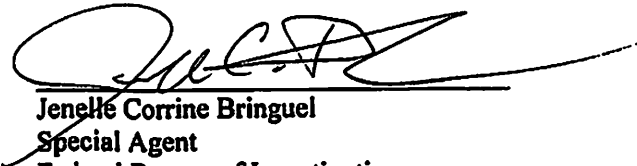
fantasies about young girls, between the ages of 10-12, and that he has masturbated to images of child pornography he has received via Kik. HILLER advised that his personal cell phone number is 607-760-9XXX.

11. During the execution of the search warrant at HILLER'S residence, a forensic preview was conducted of an iPad Air found in HILLER's bedroom. The name given to the device was "Jacks ipad air 2." On this device, at least one image of child pornography was found. It is available for the court's review upon request, and is described as follows:

a. File name: IMG\_2971.png: This image depicts two nude females, approximately 10 years old. One female is on all fours with her backside facing the camera and her vagina is exposed in a lewd and lascivious manner. The other female is sitting next to the other female; however, her body is facing away from the camera.

**Conclusion**

12. Based upon the above information, there is probable cause to establish that JACK G. HILLER JR has violated Title 18, United States Code §§ 2252A(a)(2)(A), (b)(1) and 2256(8)(A) (receipt of child pornography) which prohibits knowingly receiving child pornography using a means and facility of interstate and foreign commerce, and in and affecting such commerce, and your Affiant requests that a criminal complaint and arrest warrant be issued pursuant to these violations of federal law.

  
Jenelle Corrine Bringuel  
Special Agent  
Federal Bureau of Investigation

Sworn to me this 21<sup>ST</sup>  
day of August 2018.

  
Hon. Therese Wiley Daneks  
United States Magistrate Judge

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ACCORDANCE WITH THE REQUIREMENTS OF  
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